

C. DUKES SCOTT
EXECUTIVE DIRECTOR

P.O. Box 11263
Columbia, S.C. 29211



Phone: (803) 737-0800
Fax: (803) 737-0801

DAN FARNETT
CHIEF OF STAFF

177525

January 18, 2006

Frank R. Ellerbe, III, Esquire
Robinson, McFadden & Moore, P.C.
Post Office Box 944
Columbia, SC, 29202

RE: Application of Palmetto Utility Protection Service, Incorporated for Assignment
of the 811 Abbreviated Dialing Code to Be Implemented in South Carolina
Docket No. 2005-390-C

Dear Mr. Ellerbe:

Please find enclosed and served on you the Office of Regulatory Staff's First Continuing
Data Requests in the above referenced matter. Please let me know if you have any questions.

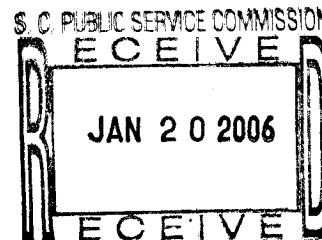
Sincerely,

Nanette S. Edwards

NSE/pjm

Enclosure

cc: Mr. Charles L.A. Terreni



BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA

DOCKET NO. 2005-390-C

IN RE: Application of Palmetto Utility)	OFFICE OF REGULATORY
Protection Services, Inc. for)	STAFF'S FIRST CONTINUING
Assignment of the 811 Abbreviated)	DATA REQUEST
Dialing Code in South Carolina)	

TO: Frank R. Ellerbe, III Counsel for Palmetto Utility Protection Services, Inc. :

Pursuant to S.C. Code Ann. Section 58-4-10, 58-4-50, and 58-4-55, as enacted by 2004 S.C. Acts 175, and 26 S.C. Code Regs. 103-853 (Supp. 2003), the Office of Regulatory Staff hereby serves the within Data Requests upon Palmetto Utility Protection Services, Inc., (hereafter referred to as "PUPS").

The Office of Regulatory Staff hereby requests, pursuant to 26 S.C. Code Regs. 103-853 (Supp. 2003), that you answer the following data requests in writing and under oath within ten (10) days after service at the Office of Regulatory Staff, 1441 Main Street, Suite 300, Columbia, South Carolina, 29201. If you are unable to respond to any of the data requests, or part or parts thereof, please specify the reason for your inability to respond and state what other knowledge or information you have concerning the unanswered portion.

As used in these data requests, "identify" means, when asked to identify a person, to provide the full name, business title, address and telephone number. When asked to identify a document, "identify" means to provide a full and detailed description of the

document. In lieu of providing a full and detailed description of a document, you may attach to your responses a copy of the document and identify the person who has custody of it. When the word "document" is used herein, it means any written, printed, typed, graphic, photographic, or electronic matter of any kind or nature and includes, but is not limited to, statements, contracts, agreements, reports, opinions, graphs, books, records, letters, correspondence, notes, notebooks, minutes, diaries, memoranda, transcripts, photographs, pictures, photomicrographs, prints, negatives, motion pictures, sketches, drawings, publications, and tape recordings.

Wherever in this data request a masculine pronoun or possessive adjective appears, it refers to both males and females in accordance with traditional English usage.

IT IS THEREFORE REQUESTED:

- I. That all information shall be provided to the South Carolina Office of Regulatory Staff in the format requested.
- II. That all responses to the data requests below be labeled using the same numbers as used herein.
- III. That the requested information be bound in 3-ring binders with numbered tabs between each question.
- IV. That if information requested is found in other places or other exhibits, reference shall not be made to those; instead, reproduce and place in the Data Request in the appropriate numerical sequence.
- V. That any inquiries or communications relating to questions concerning clarification of the data requested below should be directed to Mak Moore, of the South Carolina Office of Regulatory Staff.
- VI. That this entire list of questions be reproduced and included in front of each set of responses.
- VII. That each question be reproduced and placed in front of the response provided and the full name of the individual(s) providing the response be identified.

- VIII. That PUPS provide six (6) paper copies of responses to the South Carolina Office of Regulatory Staff. In addition and if technically feasible, it is requested that PUPS provide an electronic version of the responses.
- X. If the response to any data request is that the information requested is not currently available, please state when the information requested will be available.
- XI. That in addition to the signature and verification at the close of PUPS responses, the PUPS witness(es) or employee(s) or agent(s) responsible for the information contained in each response be indicated.
- XII. This Data Request shall be deemed to be continuing so as to require PUPS to supplement or amend its responses as any additional information becomes available.
- XIII. For information requested herein where the information is kept, maintained, or stored using spreadsheets, please provide electronic versions of the spreadsheets, including the formulas used and embedded in the spreadsheet.

DATA REQUESTS

- 1.1 Please provide a list of the PUPS members.
- 1.2 Please explain the details of the funding arrangements between PUPS and its members.
- 1.3 Please provide a brief description of the rates, services and collection practices for PUPS.
- 1.4 Please provide the hours of operation of the call center for PUPS one-call notification system. Will there be access to the 811 number 24 hours a day, 7 days a week? If not, will there be a back up number or recording to provide assistance on a full time basis and will the 811 number be available 24 hours a day, 7 days a week?
- 1.5 If this petition is granted will cellular end users be able to dial 811 and reach your service?
- 1.6 Please explain the current operation of PUPS one-call notification system.
- 1.7 Please provide financial statements for 2005 and projected financial statements for 2006.
- 1.8 Has PUPS reviewed the tariffs filed by telecommunications carriers regarding N11 services?
- 1.9 Does PUPS have a deadline or target date to access the 811 number?

January 18, 2006

A handwritten signature in cursive script, reading "Nanette S. Edwards", is positioned above a horizontal line.

Nanette S. Edwards Esquire
Office of Regulatory Staff
P.O. Box 11263
Columbia, South Carolina 29211
Phone: (803) 737-0800
Fax: (803) 737- 0895